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October 11, 2012

Ms. Ashley Carter  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00521013  
RE: 2012 July Quarterly Report (4/1/2012-6/30/2012)

Dear Ms. Carter:

I am writing as counsel to Florida Freedom PAC (?FFP?) in response to the Commission?s request for additional information related to the description of certain disbursements disclosed on Schedule B, supporting Line 21(b) of the above referenced report filed by FFP. The committee has amended the July Quarterly Report to provide more specific descriptions for these itemized disbursements.

In addition, the Commission has also inquired about the disclosure of reimbursements to staff and other individuals for travel, subsistence and other expenses on Schedule B, supporting Line 21(b). The amended report itemizes the reimbursements, when required, according to Commission regulations. However, in some instances, receipts were not obtained by the individuals that were reimbursed and the committee is unable to provide additional information on these transactions.

Regarding the question relating to the travel stipends disclosed on Schedule B, supporting Line 21(b), all travel stipends were paid using checks or included in employee salaries. No travel stipends were paid using petty cash.

You have also inquired about the apparent failure to file a timely 48-hour report, as required by 11 CFR ? 104.4(b). FFP acknowledges that it should have filed a 48-hour report prior to July 2, and that, in failing to do so, it violated ? 104.4(b). However, the extent of the violation is less than it may at first appear.

The payment you cite was the \$48,555.27 paid to Florida New Majority (?FNM?), a Florida nonprofit corporation that acted as FFP?s agent as FFP was establishing its accounting and payroll systems following FFP?s creation in May of this year. The funds transferred to FNM on June 18 were an estimate of the amounts to be paid to door-to-door canvassers and expenditures in support of that canvass for canvassing expressly advocating the reelection of President Obama that began on that day and that continued through the end of the month. During that period, numerous canvassers worked for FFP to contact Florida voters and distribute literature, and FFP incurred expenses for food, gasoline, and other canvass-related costs. These expenses were for communications made throughout the effort, some on the first day of the canvass and some on subsequent days through the end of the month. The employees engaged in these efforts were hourly employees whose compensation varied depending on their availability and the needs of the canvass, and the expenses they incurred were likewise unpredictable. This made it impossible to know the amount each employee was to be paid and the amount of the expenses incurred until time records were reviewed at the end of each pay period and requests for reimbursements were submitted.

Thus, the payment you cite was for some communications on June 18 and others later in the month. At some point on or after June 18, FFP?s expenditure exceeded the \$10,000 threshold that should have triggered a 48-hour report that would

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